

AB:MGD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- x
UNITED STATES OF AMERICA

- against -

ALFRED KEVIN QUINCY JOHNSON,

Defendant.
----- x

COMPLAINT

(21 U.S.C. §§ 952(a) and 960)

Case No.

19 M 262

EASTERN DISTRICT OF NEW YORK, SS:

Robert Martinez, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about March 25, 2019, within the Eastern District of New York and elsewhere, the defendant ALFRED KEVIN QUINCY JOHNSON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof, cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his beliefs are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


1. On or about March 25, 2019, the defendant ALFRED KEVIN QUINCY JOHNSON arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York aboard Caribbean Airlines Flight 526 from Georgetown, Guyana. The defendant purchased his ticket in cash.

2. At JFK, Customs and Border Protection (“CBP”) selected the defendant for inspection. The defendant presented one personal carry-on bag and one checked bag for inspection. The defendant stated that he had packed the bags himself and that they belonged to him. Both bags were locked and the defendant possessed keys for the bags. A handwritten airline sticker on the checked bag bore the defendant’s name.

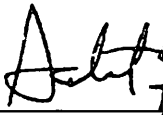
3. Upon inspection of the checked luggage, the CBP officer observed a strong odor of glue and noted that the bottom of the suitcase itself felt unusually thick and heavy. Based on the officer’s training and experience, the officer understood that drug traffickers frequently alter suitcases to create hidden compartments in which to smuggle narcotics into the United States. The bottom of the suitcase was probed and a white powdery substance was released from the lining. The white powdery substance subsequently field-tested positive for cocaine.

4. A total gross weight of approximately 1,135 grams of cocaine was seized.

WHEREFORE, your deponent respectfully requests that the defendant
ALFRED KEVIN QUINCY JOHNSON be dealt with according to law.


Robert Martinez
Special Agent
Homeland Security Investigations

Sworn to me before this
25th day of March, 2019


THE HONORABLE
UNITED STATES MAGISTRATE
EASTERN DISTRICT OF NEW YORK

